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June 25, 2012

Ms. Nora Gierloff
City of Tukwila Department of Community Development
6300 Southcenter Boulevard, Suite 100
Tukwila, WA 98188

Re: Proposed Southcenter Architectural Design Manual

Dear Ms. Gierloff:

Thank for this opportunity to provide Westfield's comments on your draft Southcenter Architectural Design Manual, the Book 3 design review guidelines that are proposed as part of the update to the Tukwila Urban Center Plan. We have previously commented on Books 1 and 2 of the proposed Urban Center Plan.

Westfield recommends two minor changes to the threshold for architectural design review set forth in proposed Section 18.28.020.C. We had postponed commenting on these thresholds until we had an opportunity to review the design review guidelines.

Our first recommended change is to revise the third bullet under 18.28.020.C.1.b.(1) to read as follows:

- *Any exterior repair, reconstruction, cosmetic alterations or improvements, when the cost of that work exceeds ten percent (10%) of the building's current assessed valuation*

This proposed change is consistent with the existing design review threshold language in TMC 18.16.030.C.2 and clarifies that the threshold relates to the cost of the specific exterior work being performed, not the cost of the total project.

Our second recommended change is to add a new subsection (3) to 18.28.020.C.1.b. to reads as follows:

(3) Design review is only required for that portion of a structure triggering the design review threshold.

This language would clarify that when an exterior repair, reconstruction, alteration or improvement triggers design review, or when an exterior expansion triggers design review,

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design review would be limited to that portion of the structure which is being repaired, reconstructed, altered, improved or expanded. This clarification would ensure that the applicability for design review is consistent with applicability of the remainder of Chapter 18.28, as described in proposed section 18.28.030.C.2, which states that "expansions of existing buildings shall meet all requirements for the new portions of the structure."

With regard to the proposed Southcenter Architectural Design Manual, Westfield appreciates the staff's desire to enhance the design of the Urban Center. However, Westfield is concerned that the proposed Design Manual may impose requirements that result in substantially increased development costs and may fail to recognize unique issues faced by Westfield, existing tenants and those prospective tenants that are interested in locating at Southcenter Mall. We encourage the City to incorporate provisions that allow for greater flexibility in the implementation of these guidelines.

The specific concerns we have identified in the Design Manual are listed below.

1. Section I.B.5, Page 5

This section reads:

B. Develop an architectural design expression that is responsive to the site and surrounding context.

5. To the extent feasible service areas shall be oriented away from the public realm.

Westfield is concerned with how the city will interpret the term "feasible." Feasibility necessarily involves technical, economic and business judgment. We would encourage the city to replace "shall" with "should" recognizing that this is a worthy design objective but one that may not always be feasible.

2. Section V.D. Page 35

The provision reads:

D. Secondary Entrances: Side or rear building entries shall be visible and easy to find, but visually secondary to main entrances.

Westfield is concerned with how this guideline will be interpreted for the Southcenter Mall, which, as you know, maintains multiple main entrances. Should a redevelopment occur at the mall that triggers design review, Westfield does not want to be limited to building only a "visually secondary" entrance. It seems that this provision should not be applicable to a large retail building such as the Southcenter Mall.

3. Section V.E.1, Page 35

This provision reads:

Loading and Service Entrances shall be designed to minimize visibility from the public realm.

1. All service entrances and associated loading docks and storage areas shall be located to the side or rear of the building unless all facades face a public street in which case the least visible location shall be used.

Westfield is concerned with how this provision will be interpreted for the Southcenter Mall, which faces four separate public streets. Determining the “least visible location” may not meet the needs of the retailer(s) involved and may simply not be feasible. We would suggest that the term “shall” be replaced with “should.” The City should also consider allowing reasonable screening to achieve this objective.

4. Section VI.A, Page 35.

The provision reads:

Weather protection

Non-residential buildings shall provide pedestrian weather protection along adjacent sidewalks or open spaces using awnings, canopies, or building overhangs

Westfield is concerned with a requirement to provide weather protection along all of its private sidewalks and open spaces. This provision appears focused on providing weather protection along public street fronts but, as written, would also be applicable to the multiple sidewalks, pathways, and exterior corridors on Westfield’s property. In some locations, such as the wide open space area recently built along the south façade, it would be impracticable to provide effective weather protection. Westfield questions the need for weather protection where private sidewalks and corridors are designed solely for safe pedestrian connections from the parking lot to the Mall entrances and not for the type of retail experience appropriate for sidewalks in the public realm.

5. Section XI. Appendix A, Page 57

This provision reads:

A. Mixed Use Buildings – Desirable Design Elements

Westfield is concerned that this appendix not be used to characterize a mall building with a mix of retail and non-retail uses as a “mixed use building.” The discussion of “mixed use buildings” in this Appendix appears to focus on the traditional mixed-use building where retail is provided on the ground floor and residential or office is provided on the upper stories. I understand that the city may delete this appendix. If it is not deleted, we would ask that it be clarified so that the “desirable design elements” only apply to the “traditional” mixed-use buildings and not be applicable to a mall simply because the mall may have a mix of tenants.

Thank you for this opportunity to comment on your draft. We look forward to further opportunities to participate in the review process.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brent Carson", with a long horizontal flourish extending to the right.

Brent Carson

BC:bc

cc: Dan Pascale
Antony Ritch
Lynn Miranda